

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

YADIRA VARGAS TIRADO

DEBTOR

CASE NO 16-08946 BKT

CHAPTER 13

**REPLY TO TRUSTEE'S MOTION TO DISMISS DOCKET NO. 152 AND
DEBTOR'S REQUEST FOR EXTENSION OF TIME TO CURE
BALANCE IN PLAN ARREARS**

TO THE HONORABLE COURT:

COMES NOW, YADIRA VARGAS TIRADO, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 152, stating that the Debtor is in arrears in the Plan payments in the sum of \$1,500.00, thus, requesting the dismissal of the present case for failure to maintain current the confirmed Plan payments.

2. That the Debtor respectfully states on September 25, 2020, the Debtor made three (3) payments to the Plan, each in the sum of \$300.00, for a total paid-in of \$900.00. The Debtor respectfully admits that the Plan payments are still in arrears, and that the balance in arrears is the sum of \$600.00 or two (2) payments of \$300.00. See attached *Financial Summary Report*, dated 09/29/2020, which reflects the aforesaid 09/25/2020 Plan payments.

3. The Debtor respectfully submits that she is in the process of obtaining the funds to cure said confirmed Plan arrears, in the present case.

4. That the Debtor respectfully requests additional time within to obtain the funds to cure the Plan arrears in the present case.

5. Based on the aforementioned, the Debtor respectfully requests an extension of time of thirty (30) days within to cure the Plan arrears in the present case. This extension of time to expire on October 29, 2020.

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**Debtor's Reply to Trustee's Motion to Dismiss
and Request for Extension of Time
to Cure Plan Arrears
Case no. 16-08946 BKT13**

WHEREFORE, the Debtor respectfully requests that for the above stated reasons this Honorable Court grant the present motion and grant the requested extension of time to cure the balance in the Plan arrears, as stated by the Chapter 13 Trustee in his motion to dismiss, Docket No. 152, in the above captioned case.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee and to all CM/ECF participants; and also I certify that I have mailed by United States Postal Service copy of this motion to the following CM/ECF non-participants: the Debtor, Yadira Vargas Tirado, HC 43 Box 12141 Cayey PR 00736.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 29th day of September, 2020.

/s/ **Roberto Figueroa Carrasquillo**
USDC #203614
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FINANCIAL SUMMARY - CASE 16-08946

YADIRA VARGAS TIRADO paying **\$300.00** MONTHLY

Receipts Rcpts/Deb Refunds Disbursements Adjustments Trustee Disb Trustee Adj [Show All](#)

Limits: Select Start Date Select Claim ID Select Payee Name Check Status: [Cleared](#) [State Dated](#) [Stop Payment](#) [Cancelled](#) [Voided](#) [Outstanding](#)

Date	Payee	Payee Name	Source / Check	Description	Receipts	Disbursements	Balance
9/25/2020			000000000004861	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
9/25/2020			000000000004852	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
9/25/2020			000000000004843	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
5/27/2020			000000000002602	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
4/29/2020			000000000003095	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
3/26/2020			000000000000371	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
2/5/2020			0000000000005120	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
2/5/2020			0000000000005131	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
12/2/2019			0000000000007425	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
10/22/2019			000000000000594	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
9/10/2019			0000000000007206	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$600.00		
7/22/2019			0000000000003901	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
7/5/2019			0000000000002985	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
5/24/2019			000000000000507	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
5/21/2019			0000000000007111	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
2/19/2019			0000000000009285	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
1/23/2019			0000000000005796	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
12/24/2018			0000000000001028	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
11/30/2018			0000000000008477	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
10/23/2018			0000000000005028	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
9/25/2018			0000000000003817	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
9/10/2018			0000000000004621	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
8/6/2018			0000000000006915	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
7/19/2018			0000000000003406	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$501.44		
6/4/2018			0000000000002746	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
5/7/2018			0000000000001398	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$398.56		
4/9/2018			0000000000000922	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
2/20/2018			0000000000006258	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
1/31/2018			0000000000009394	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
12/27/2017			0000000000004723	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
12/11/2017			0000000000008288	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
12/4/2017			0000000000009198	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
11/3/2017			0000000000002810	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
9/21/2017			0000000000005744	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
8/22/2017			0000000000005060	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
7/31/2017			0000000000007137	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
6/30/2017			0000000000004840	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
4/28/2017			0000000000005715	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
4/3/2017			0000000000005136	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
2/28/2017			0000000000000003	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
1/30/2017			0000000000007254	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
11/28/2016			0000000000007550	MONEY ORDER/PAYMENT TO DEBTOR ACCOUNT-FTB	\$300.00		
Totals:					\$13,200.00	\$0.00	